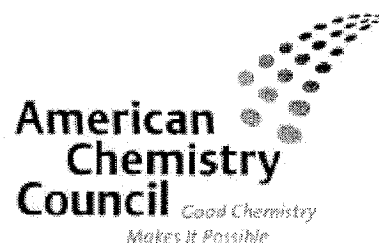


201-13438

COURTNEY M. PRICE
VICE PRESIDENT
CHEMSTAR



December 21, 2001

Via US Mail and E-mail

Christine Todd Whitman, Administrator
U.S. Environmental Protection Agency (EPA)
P.O. Box 1473
Merrifield, VA 22116

**Re: Formic Acid and Formates Panel, Consortium No. [REDACTED]
HPV Chemical Challenge Program Submission
Formates Category Justification and Testing Rationale**

Dear Administrator Whitman:

The Formic Acid and Formates Panel of the American Chemistry Council is pleased to submit the subject documents to EPA's HPV Chemical Challenge Program (Program) as our initial test plan for a category covering three chemicals (methyl formate, sodium formate and calcium formate). The Formic Acid and Formates Panel includes the following member companies that are sponsoring these chemicals under the Voluntary HPV Chemical Challenge Program: BASF Corporation, Bayer Corporation, Celanese, GEO Specialty Chemicals and Hercules Inc.

This submission includes the following documents:

- Formic acid robust data summaries in IUCLID format;
- Methyl formate robust data summaries in IUCLID format;
- Sodium formate robust data summaries in IUCLID format;
- Calcium formate robust data summaries in IUCLID format; and
- Test Plan for Formates.



Responsible Care®

Christine Todd Whitman
Formic Acid and Formates HPV Chemical Challenge Program
December 21, 2001
Page 2 of 2

Data on formic acid are used to support the conclusions reached for the formates category. Although the ACC Formates Panel is not sponsoring formic acid under the HPV Chemical Challenge Program, an European consortium is sponsoring the chemical under the ICCA Initiative.

This submission is also being sent electronically to the following e-mail addresses:

Oppt.ncic@epa.gov
Chem.rtk@epa.gov

If you require additional information, please contact Has Shah, Formic Acid and Formates Panel Manager at (703) 741-5637 or has_shah@americanchemistry.com.

Courtney M. Price
Vice President, CHEMSTAR

Attachments

cc: C. Auer, EPA/OPPT
B. Leczynski, EPA/OPPT
Formic Acid and Formates Panel Members
S. Russell, ACC
J. Keith, ACC